

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

Dianne Fletcher, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

VISA, INC.,

Defendant.

Case No.: 4:24-cv-00752-FJG

DEFENDANT VISA INC.’S UNOPPOSED MOTION TO TRANSFER VENUE

Defendant Visa Inc. (“Visa”) hereby moves to transfer this action to the United States District Court for the Southern District of New York under the first-filed rule and pursuant to 28 U.S.C. § 1404(a) on the basis that five other earlier-filed actions containing the same allegations as presented in this case are currently pending in that District before the same judge, the Honorable John G. Koeltl. A transfer to the Southern District of New York would promote the interests of justice and judicial economy, and be more convenient for the parties and witnesses. Plaintiff has consented to transfer her case to the Southern District of New York. In support of this Motion, Visa is contemporaneously filing its Supporting Suggestions in Support of the Unopposed Motion to Transfer.

WHEREFORE, Visa respectfully requests that the Court enter an order transferring this action to the Southern District of New York.

Dated: December 2, 2024

Respectfully submitted,

/s/ Matthew Eisenstein

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Anne Davis (*pro hac vice*)

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